

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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NEDRA HASTINGS, on her own behalf)
And on behalf of her minor child, N.H.)
Plaintiffs,)

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W.D. OF TN, MEMPHIS

v.)

No. _____

STATE OF TENNESSEE; SHELBY COUNTY)
GOVERNMENT; SHELBY COUNTY CIRCUIT)
COURT CLERK-JIMMY MOORE, in his official)
& individual capacity; VAN STURDIVANT; in his)
official & individual capacity; SHELBY COUNTY)
GENERAL SESSIONS COURT CLERK-ED)
STANTON, in his official & individual capacity;)
CITY OF MEMPHIS GOVERNMENT; CITY OF)
MEMPHIS GENERAL SESSIONS COURT)
CLERK-THOMAS E. LONG, in his official &)
individual capacity; SHELBY COUNTY)
SHERIFF'S OFFICE; MEMPHIS POLICE)
DEPARTMENT; CATRICE DYE #1713, in her)
official & individual capacity; FELECICA ADAMS)
in her official & individual capacity; DIONNE)
ROGERS, in her official & individual capacity;)
NICOLLE BRUMLEY, in her official & individual)
capacity; RAYMOND SIDES-in his official &)
individual capacity; FAMILY SAFETY CENTER;)
SHELBY COUNTY CRIME VICTIM'S CENTER;)
SHELBY COUNTY DEPARTMENT OF)
CORRECTIONS; SHELBY COUNTY DISTRICT)
ATTORNEY'S OFFICE; AMY WEIRICH, in her)
official & individual capacity; TERESA)
McCUSKER, in her official & individual capacity;)
BILL HILL, in his official & individual capacity;)
JAIME KIDD, in her official & individual capacity;)
MARK GLANKLER; in his official & individual)
capacity; RAYMOND SIDES, in his official &)
individual capacity; SHELBY COUNTY PUBLIC)
DEFENDER'S OFFICE; STEPHEN BUSH, in his)
official & individual capacity; SHERRY)
BROWN, in her official & individual capacity;)
ROBERT FELKNER, in his official & individual)
capacity; KAYCEE MARIE ARNOLD, in her)
official & individual capacity; MARGUERITE)
HOWARD, in her official & individual capacity;)

JURY DEMAND

RHONDA HARRIS, in her official & individual)
 capacityDONNA M. FIELDS, in her official &)
 individual capacity; ROBERT S. WEISS, in his)
 official &individual capacity; VALARIE L. SMITH,))
 in her official & individual capacity; GERALD)
 SKAHAN, in his official & individual capacity;)
 WILLIAM C. TURNER, in his official & individual)
 capacity; RONALD S. LUCCHESI, in his official &))
 individual capacity; MARTY McAfee, in his)
 official & individual capacity; JEANNIE M.)
 KOSCIOLEK, in her official & individual capacity;)
 ANNA L. PHILLIPS, in her individual capacity;)
 DEWUN R. SETTLE, in his individual capacity;)
 CEDRIC D. WOOTEN, in his individual capacity;)
 PAUL J. SPRINGER, in his individual capacity;)
 DEMETRECE B. JONES, in her individual)
 capacity; MARCOLM J. WATSON, in his)
 individual capacity; SONYA L. WATSON, in her)
 individual capacity; JACQUELYN B. SCRUGGS,)
 in her individual capacity; et. al.,)
 Defendants.)

COMPLAINT

COMES NOW, Ms. Nedra Hastings (formerly Nedra Drayton and hereinafter referred to as "Plaintiff") and on behalf of her minor child, referred to N.H.; files their Complaint, and respectfully alleges unto this Honorable Court the following, to wit:

I. INTRODUCTION

1. This is a civil action to make whole the Plaintiff, for interference and/or deprivation of rights secured by the United States Constitution and laws; rights guaranteed by the Americans with Disabilities Act of 1973; and rights under the Civil Rights Act of 1871 (Section 1983), "which imposes liability upon every person who, acting under the color of law of any state or territory or the District of Columbia;"¹ including gross negligence; and for retaliation for exercise

of such rights; interstate stalking; and, common law claims for malicious prosecution, defamation, intentional infliction of emotional distress, loss of consortium, and damages.

II. PARTIES

2. Plaintiffs, at all times relevant to this Complaint, resided in Memphis, Shelby County, Tennessee.

3. Defendants are local governmental entities and/or private individuals, doing business and/or residing in Shelby County, in the State of Tennessee.

III. JURISDICTION AND VENUE

4. Plaintiffs bring this action under 42 U.S.C.A. § 1983, alleging the original jurisdiction of this Honorable Court over this private suit to enforce federal civil rights and common law protections and remedies.

5. Venue is proper in the U.S. District Court for the Western District of Tennessee pursuant to 28 U.S.C. §1391(b)(2), because the unlawful practices & actions occurred within Shelby County, Tennessee, where Plaintiffs lived, where Plaintiffs suffered the unlawful practices & actions, and the resultant damages.

IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

6. Plaintiffs have met all procedural requirements for filing this Complaint, including administrative exhaustion required for jurisdiction in this Court.

7. Plaintiff, Nedra Hastings, has filed complaints, reports, order of protections as compared to what the average person, if not more, is capable of doing.

V. STATEMENT OF FACTS

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff(s) respectfully pray that this Honorable Court:

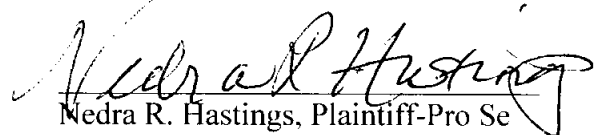
- A. Declare and adjudge the Defendants violated Plaintiffs rights under 42 U.S.C.A. § 1983 *et seq*;
- B. Order Defendants to immediately cease and desist from all retaliatory and discriminatory behavior as described in this Complaint;
- C. Award Plaintiff(s) nominal damages, against appropriate Defendants;
- D. Award Plaintiff(s) compensatory damages, including but not limited to medical bills, legal fees, emotional pain & suffering, against appropriate Defendants;
- E. Award Plaintiff(s) the costs of this action and reasonable discretionary fees;
- F. Award Plaintiff(s) such other relief as the Court deems just and proper.

VII. TRIAL BY JURY

Plaintiff(s) respectfully demand a trial by jury on all issues.

Dated: September 15, 2017

Respectfully submitted,



Nedra R. Hastings, Plaintiff-Pro Se

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